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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

MEDAK TRUCKING, LLC

Debtor

Chapter 11

Case No. 16-24788

Hon. Judge: Michael B. Kaplan

Hearing Date & Time: 04/02/18 at 10 AM

Oral Argument Not Requested

**NOTICE OF MOTION TO CONVERT CASE TO CHAPTER 7
PROCEEDING PURSUANT TO 11 U.S.C.A. § 1112(a)**

TO: All On Attached Certificate of Service

PLEASE TAKE NOTICE that the Debtor Medak Trucking, LLC will move before the Honorable Michael B. Kaplan on April 2, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey for an Order Converting the above captioned Case to a Chapter 7 Proceeding Pursuant to 11 U.S.C.A. § 1112(a), and for such other and further relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that any papers in opposition to the Motion must be filed with the Court and served simultaneously upon Guillermo J. Gonzalez, as counsel for the Debtor, at 1599 Hamburg Turnpike, Wayne, New Jersey no later than seven days in advance of the hearing date. If opposing papers are not filed and served within the required time,

the Motion shall be deemed uncontested and an Order Converting Chapter 11 Case to Chapter 7 Case may be signed and entered in the Court's discretion.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested, unless opposition papers are filed with the Court.

PLEASE TAKE FURTHER NOTICE that this matter does not involve complicated issues of law or fact and therefore no brief is necessary.

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**SCURA, WIGFIELD, HEYER
STEVENS & CAMMAROTA, LLP**
Counsel for Medak Trucking, LLC

Dated: March 8, 2018

By: /s/ Guillermo J. Gonzalez
Guillermo J. Gonzalez